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7	Attorneys for Complete Entertainment Resources LLC		
8	LIMITED STATES	DISTRICT COLIDT	
9	UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION		
10		, I	
11	Complete Entertainment Resources LLC d/b/a Songkick,	CASE NO. 15-cv-9814 DSF (AGRx)	
12	Plaintiff,	DECLARATION OF ADAM WOLFSON IN SUPPORT OF	
13	V.	PLAINTIFF COMPLETE	
14	Live Nation Entertainment, Inc.;	ENTERTAINMENT RESOURCES LLC'S OPPOSITION TO	
15	Ticketmaster LLC,	DEFENDANTS' PARTIAL	
16	Defendants.	MOTION FOR SUMMARY JUDGMENT	
17	Ticketmaster LLC,	Complaint Filed: December 22, 2015	
18	Counter Claimant,	Judge: Hon. Dale. S. Fischer	
19	V.	Date: August 7, 2016	
		11111e. 1.30 p.111.	
20	Complete Entertainment Resources	Crtrm.: 7D	
20 21	LLC'd/b/a Songkick,	Crtrm.: 7D Motion Hearing Cut-Off: Aug 7, 2017 Pre-Trial Conference: October 16, 2017	
		Crtrm.: 7D Motion Hearing Cut-Off: Aug 7, 2017 Pre-Trial Conference: October 16, 2017 Trial Date: November 14, 2017	
21	LLC'd/b/a Songkick,	Crtrm.: 7D Motion Hearing Cut-Off: Aug 7, 2017 Pre-Trial Conference: October 16, 2017 Trial Date: November 14, 2017 UNREDACTED VERSION OF DOCUMENT PROPOSED TO BE	
21 22	LLC'd/b/a Songkick,	Crtrm.: 7D Motion Hearing Cut-Off: Aug 7, 2017 Pre-Trial Conference: October 16, 2017 Trial Date: November 14, 2017	
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21 22 23 24	LLC'd/b/a Songkick,	Crtrm.: 7D Motion Hearing Cut-Off: Aug 7, 2017 Pre-Trial Conference: October 16, 2017 Trial Date: November 14, 2017 UNREDACTED VERSION OF DOCUMENT PROPOSED TO BE	
2122232425	LLC'd/b/a Songkick,	Crtrm.: 7D Motion Hearing Cut-Off: Aug 7, 2017 Pre-Trial Conference: October 16, 2017 Trial Date: November 14, 2017 UNREDACTED VERSION OF DOCUMENT PROPOSED TO BE	
2122232425	LLC'd/b/a Songkick,	Crtrm.: 7D Motion Hearing Cut-Off: Aug 7, 2017 Pre-Trial Conference: October 16, 2017 Trial Date: November 14, 2017 UNREDACTED VERSION OF DOCUMENT PROPOSED TO BE	
21 22 23 24 25 26	LLC'd/b/a Songkick,	Crtrm.: 7D Motion Hearing Cut-Off: Aug 7, 2017 Pre-Trial Conference: October 16, 2017 Trial Date: November 14, 2017 UNREDACTED VERSION OF DOCUMENT PROPOSED TO BE	

DECLARATION OF ADAM WOLFSON

I, Adam Wolfson, declare as follows:

- 1. I am a member of the bars of the State of California and New York, and a partner at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Complete Entertainment Resources LLC d/b/a Songkick ("Songkick"). I provide this declaration in support of Songkick's response to Defendants' motion for partial summary judgment, and make the points set forth below based on personal, firsthand knowledge. If called and sworn as a witness, I could and would testify as set forth below.
- 2. Defendants claim in their motion that Ticketmaster loses \(\begin{align*} \text{%} of \\ "formal" requests for proposal, also known as "RFPs" (although I note that Defendants provide no evidence for this fact besides a former employee's say so, *see* Dkt. 220-2 \(\begin{align*} 33 \)). Defendants also claim that approximately \(\begin{align*} \begin{align*} \text{ of Ticketmaster's contracts expire and come up for bid each year. Dkt. 220-2 \(\begin{align*} 37 \). As set forth in the Rebuttal Expert Report of Joseph Farrell, D.Phil., documents Defendants produced in this litigation indicate that Ticketmaster only loses \(\begin{align*} \begin{align*} \begin{align*} \text{ of competitive bids for contract renewals. If all of these facts are true, then Ticketmaster, at most, loses only \(\begin{align*} \begin{alig
- ." Dkt. 220-2 ¶ 36. My review of the record indicates that Defendants are misrepresenting the average length of their contracts by trying to imply they are shorter on average than in reality. In this litigation, Songkick requested that Ticketmaster produce all of its venue contracts, but Ticketmaster refused on burden grounds. The parties therefore reached a compromise whereby Ticketmaster would produce a sample of contracts that Songkick could rely on as representative of Ticketmaster's broader set of venue contracts. In response to

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- Defendants' claim regarding the typical length of their contracts, my team reviewed those contracts for their term length and then calculated the mean length. That review indicates when Ticketmaster enters a contract with a venue, the average length is years. Furthermore, a substantial number of those representative contracts—just under \(\bigcup_{\pi}\)—are longer than \(\bigcup_{\pi}\) years in length.
- 4. I understand that Songkick recently received a subpoena from the Federal Bureau of Investigation and the U.S. Attorney's Office for the Eastern District of New York for information underlying its allegations that Defendants and their employees hacked into Songkick's systems and misappropriated its trade secrets, and that those entities are currently investigating Defendants' conduct.
- In their motion, at page 59, Defendants discuss the evidence in the record 5. regarding the reasons Songkick lost business from 139 music artists identified in the expert report of David Yurkerwich. Among other things, Defendants stated "[c]ertainly no such evidence came out in the depositions of Songkick's management team." They further state that "Songkick's CEO, for example, could only identify two artists allegedly lost due to Ticketmaster's conduct." In response to these claims, my team re-reviewed the transcripts and, based on that review, I believe Defendant's statements to be materially misleading. First, Defendants did not ask the Songkick management team members they deposed (Matt Jones, Stephen Glicken, Jesse Bellin, Josh Block, and Adam Schiffer) any sort of overarching question about the identity and scope of the artists they believed Songkick lost to Defendants' conduct. Second, with respect to Mr. Jones in particular, Defendants only asked him about two artists in particular, and so he provided testimony on those artists. Songkick's broader response on this point is contained in its Response to Statement of Uncontroverted Fact ¶ 187.
- 6. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the transcript of the deposition of Jared Smith taken on January 27, 2017.
 - 7. Attached hereto as Exhibit 2 is a true and correct copy from Alison-Kraus

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- 8. Attached hereto as Exhibit 3 is a true and correct copy of the Dawes New Album announcement.
- 9. Attached hereto as Exhibit 4 is a true and correct copy of the 2015 Website_Graham Nash (Wayback cite).
- Attached hereto as Exhibit 5 is a true and correct copy of the Amended 10. Complaint filed on January 29, 2010.
- 11. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiff's Responses to Defendants' First Set of Requests for Admissions No. 2 served on January 26, 2017.
- Attached hereto as Exhibit 7 is a true and correct copy of Plaintiff's 12. Response to Defendant's First Set of Interrogatories served on January 26, 2017.
- 13. Attached hereto as Exhibit 8 is a true and correct copy of Plaintiff 's Response to Defendant's First Set of Requests for Admission served on January 26, 2017 [Pages 4, 11 & 12].
- Attached hereto as Exhibit 9 is a true and correct copy of Defendant's 14. First Amended Responses to Defendant's Second Set of Interrogatories served on January 27, 2017 [Pages 20, 29 32].
- Attached hereto as Exhibit 10 is a true and correct copy of Plaintiff's 15. Supplemental Responses to Defendant's First Set of Interrogatories served on March 6, 2017.
- Attached hereto as Exhibit 11 is a true and correct copy of Plaintiff's 16. Responses to Defendant's Request for Admissions Set Two served on March 8, 2017.
- 17. Attached hereto as Exhibit 12 is a true and correct copy of the Rebuttal Report of Josh Barron dated May 8, 2017.
 - Attached hereto as Exhibit 13 (intentionally left blank). 18.
- 19. Attached hereto as Exhibit 14 is a true and correct copy of the Jason Isbell website page.

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- 20. Attached hereto as Exhibit 15 is a true and correct copy of excerpts from the transcript of the deposition of Ashley Dexter taken on March 2, 2017.
- 21. Attached hereto as Exhibit 16 is a true and correct copy of excerpts from the transcript of the deposition of Jeremy Schiffer taken on March 6, 2017.
- Attached hereto as Exhibit 17 is a true and correct copy of Deposition 22. Exhibit 363 (February 2, 2017 email string among Daniel Miller, Mike Schmitt & Justin Atkins re: Lady A)
- 23. Attached hereto as Exhibit 18 is a true and correct copy of excerpts from the transcript of the deposition of Joshua Block taken on March 7, 2017.
- 24. Attached hereto as Exhibit 19 is a true and correct copy of excerpts from the transcript of the deposition of Joshua Block taken on March 8, 2017.
 - 25. Attached hereto as Exhibit 20 (intentionally left blank).
 - 26. Attached hereto as Exhibit 21 (intentionally left blank).
 - 27. Attached hereto as Exhibit 22 (intentionally left blank).
- 28. Attached hereto as Exhibit 23 is a true and correct copy of Deposition Exhibit 672 (Yurkerwich Global Lost Profits (at 20% Presale Allocation).
- 29. Attached hereto as Exhibit 24 is a true and correct copy of ACCESS00003102, a document produced by third party Access Industries in this Action.
- 30. Attached hereto as Exhibit 25 is a true and correct copy of ACCESS00003248, a document produced by third party Access Industries in this Action.
- 31. Attached hereto as Exhibit 26 is a true and correct copy of ACCESS00003918, a document produced by third party Access Industries in this Action.
- 32. Attached hereto as Exhibit 27 is a true and correct copy of ACCESS00003918-3966, a document produced by third party Access Industries in this Action.

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- 33. Attached hereto as Exhibit 28 is a true and correct copy of ACCESS00003919, a document produced by third party Access Industries in this Action.
- 34. Attached hereto as Exhibit 29 is a true and correct copy of ACCESS00010324, a document produced by third party Access Industries in this Action.
 - 35. Attached hereto as Exhibit 30 (intentionally left blank).
- 36. Attached hereto as Exhibit 31 is a true and correct copy of ACCESS00010325, a document produced by third party Access Industries in this Action.
 - 37. Attached hereto as Exhibit 32 (intentionally left blank).
- 38. Attached hereto as Exhibit 33 is a true and correct copy ACCESS00011466, a document produced by third party Access Industries in this Action.
 - 39. Attached hereto as Exhibit 34 (intentionally left blank).
- 40. Attached hereto as Exhibit 35 is a true and correct copy of ACCESS-REV00043204, a document produced by third party Access Industries in this Action.
- 41. Attached hereto as Exhibit 36 is a true and correct copy of ACCESS-REV00043205, a document produced by third party Access Industries in this Action.
- 42. Attached hereto as Exhibit 37 is a true and correct copy of the April 17, 2016 Discovery Letter from Timothy O'Mara to Adam Wolfson.
 - 43. Attached hereto as Exhibit 38 (intentionally left blank).
 - 44. Attached hereto as Exhibit 39 (intentionally left blank).
 - 45. Attached hereto as Exhibit 40 (intentionally left blank).
- 46. Attached hereto as Exhibit 41 is a true and correct copy of the Competitive Impact Statement, United States of America et al. v. Ticketmaster Entertainment, Inc. and Live Nation, Inc. (1:10-cv-00139) (D.D.C. Jan. 25, 2010 – Dkt. 2).

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- 47. Attached hereto as Exhibit 42 (intentionally left blank).
- 48. Attached hereto as Exhibit 43 is a true and correct copy of Defendants' First Amended Responses to Second Set Interrogatories served on January 27, 2017.
- 49. Attached hereto as Exhibit 44 is a true and correct copy of the Report of Jeff Kline dated April 24, 2017.
- Attached hereto as Exhibit 45 is a true and correct copy of Report of Kyle 50. Cunningham dated March 13, 2017.
- 51. Attached hereto as Exhibit 46 is a true and correct copy of Report of Janusz Ordover dated April 24, 2017.
 - 52. Attached hereto as Exhibit 47 (intentionally left blank).
 - Attached hereto as Exhibit 48 (intentionally left blank). 53.
 - Attached hereto as Exhibit 49 (intentionally left blank). 54.
- 55. Attached hereto as Exhibit 50 is a true and correct copy of Web Page re: Deal or No Deal for Desiree Perez's House Roc Nation.
- 56. Attached hereto as Exhibit 51 is a true and correct copy of Web Page re: Web page - Live-Nation-Concert.
 - 57. Attached hereto as Exhibit 52 (intentionally left blank).
- 58. Attached hereto as Exhibit 53 is a true and correct copy of Web Page re: Irving Azoff – To Leave Live Nation.
- 59. Attached hereto as Exhibit 54 is a true and correct copy of Web Page re: 21 How a Live Nation Deal Cornered Justin Timberlake.
 - Attached hereto as Exhibit 55 is a true and correct copy of Web Page re: 60. Adam Flick LinkedIn Page.
 - 61. Attached hereto as Exhibit 56 is a true and correct copy of Web Page re: Subsidiaries
- Attached hereto as Exhibit 57 is a true and correct copy of an article 26 62. entitled: J.P. Morgan - Pandora Media Inc. Ticketfly Better Positions P w/Artists & 27 28 Labels & Drives Value Beyond Royalties - Alert.

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- 1 | Expert Report of Professor Janusz A. Ordover dated April 24, 2017.
 - 82. Attached hereto as Exhibit 77 (intentionally left blank).
 - 83. Attached hereto as Exhibit 78 is a true and correct copy of TM00039612, a document produced by Defendants in this Action.
 - 84. Attached hereto as Exhibit 79 is a true and correct copy of Deposition Exhibit 62 (Settlement and Release Agreement between Ticketmaster and String Cheese Incident Ticketing dated May 6, 2004 (SCIT-000001).
 - 85. Attached hereto as Exhibit 80 is a true and correct copy of SEQUOIA_000075, a document produced by third party Sequoia Capital in this Action.
 - 86. Attached hereto as Exhibit 81 is a true and correct copy of SK00004374, a document produced by Songkick in this Action.
 - 87. Attached hereto as Exhibit 82 is a true and correct copy of SK00005662, a document produced by Songkick in this Action.
 - 88. Attached hereto as Exhibit 83 is a true and correct copy of Deposition Exhibit 170 (Email dated June 27, 2012 from Zach Quillen to Stephen Glicken re Fan Club Policy Letters).
 - 89. Attached hereto as Exhibit 84 is a true and correct copy of SK00040399, a document produced by Songkick in this Action.
 - 90. Attached hereto as Exhibit 85 is a true and correct copy of SK00041441, a document produced by Songkick in this Action.
 - 91. Attached hereto as Exhibit 86 is a true and correct copy of SK00041442, a document produced by Songkick in this Action.
 - 92. Attached hereto as Exhibit 87 (intentionally left blank).
 - 93. Attached hereto as Exhibit 88 is a true and correct copy of SK00075267, a document produced by Songkick in this Action.
 - 94. Attached hereto as Exhibit 89 is a true and correct copy of SK00075272, a document produced by Songkick in this Action.

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- 95. Attached hereto as Exhibit 90 is a true and correct copy of SK00075303, a document produced by Songkick in this Action.
- 96. Attached hereto as Exhibit 91 is a true and correct copy of SK00075331, a document produced by Songkick in this Action.
- 97. Attached hereto as Exhibit 92 is a true and correct copy of SK00075440 a document produced by Songkick in this Action.
- 98. Attached hereto as Exhibit 93 is a true and correct copy of SK00075478 a document produced by Songkick in this Action.
- 99. Attached hereto as Exhibit 94 is a true and correct copy of SK00075487 a document produced by Songkick in this Action.
- 100. Attached hereto as Exhibit 95 is a true and correct copy of SK00075494 a document produced by Songkick in this Action.
- 101. Attached hereto as Exhibit 96 is a true and correct copy of SK00075537 a document produced by Songkick in this Action.
- 102. Attached hereto as Exhibit 97 is a true and correct copy of SK00075545 a document produced by Songkick in this Action.
- 103. Attached hereto as Exhibit 98 is a true and correct copy of SK00075557 a document produced by Songkick in this Action.
- 104. Attached hereto as Exhibit 99 is a true and correct copy of SK00075568 a document produced by Songkick in this Action.
- 105. Attached hereto as Exhibit 100 is a true and correct copy of SK00075568 a document produced by Songkick in this Action.
- 106. Attached hereto as Exhibit 101 is a true and correct copy of SK00075603, a document produced by Songkick in this Action.
- Attached hereto as Exhibit 102 is a true and correct copy of SK00076197, a document produced by Songkick in this Action.
- 108. Attached hereto as Exhibit 103 is a true and correct copy of SK00077357, a document produced by Songkick in this Action.

- 109. Attached hereto as Exhibit 104 is a true and correct copy of SK00083874, a document produced by Songkick in this Action.
- 110. Attached hereto as Exhibit 105 is a true and correct copy of SK00094081, a document produced by Songkick in this Action.
- 111. Attached hereto as Exhibit 106 is a true and correct copy of SK00124995, a document produced by Songkick in this Action.
- 112. Attached hereto as Exhibit 107 is a true and correct copy of SK00143788, a document produced by Songkick in this Action.
- 113. Attached hereto as Exhibit 108 is a true and correct copy of SK00219029, a document produced by Songkick in this Action.
- 114. Attached hereto as Exhibit 109 is a true and correct copy of SK00248312, a document produced by Songkick in this Action.
- 115. Attached hereto as Exhibit 110 is a true and correct copy of SK00257515, a document produced by Songkick in this Action.
- 116. Attached hereto as Exhibit 111 is a true and correct copy of SK00257634, a document produced by Songkick in this Action.
- 117. Attached hereto as Exhibit 112 is a true and correct copy of SK00314041, a document produced by Songkick in this Action.
- 118. Attached hereto as Exhibit 113 is a true and correct copy of SK00402382, a document produced by Songkick in this Action.
- 119. Attached hereto as Exhibit 114 is a true and correct copy of SK00424727, a document produced by Songkick in this Action.
- 120. Attached hereto as Exhibit 115 is a true and correct copy of SK00436060, a document produced by Songkick in this Action.
- 121. Attached hereto as Exhibit 116 is a true and correct copy of SK00443685, a document produced by Songkick in this Action.
- 122. Attached hereto as Exhibit 117 is a true and correct copy of SK00461555, a document produced by Songkick in this Action.

- 123. Attached hereto as Exhibit 118 is a true and correct copy of SK00464366, a document produced by Songkick in this Action.
- 124. Attached hereto as Exhibit 119 is a true and correct copy of SK00501227, a document produced by Songkick in this Action.
- 125. Attached hereto as Exhibit 120 is a true and correct copy of SK00508214, a document produced by Songkick in this Action.
- 126. Attached hereto as Exhibit 121 is a true and correct copy of SK00509338, a document produced by Songkick in this Action.
- 127. Attached hereto as Exhibit 122 is a true and correct copy of SK00518866, a document produced by Songkick in this Action.
- 128. Attached hereto as Exhibit 123 is a true and correct copy of SK00525488, a document produced by Songkick in this Action.
- 129. Attached hereto as Exhibit 124 is a true and correct copy of SK00538610, a document produced by Songkick in this Action.
- 130. Attached hereto as Exhibit 125 is a true and correct copy of SK00545737, a document produced by Songkick in this Action.
- 131. Attached hereto as Exhibit 126 is a true and correct copy of SK00548430, a document produced by Songkick in this Action.
- 132. Attached hereto as Exhibit 127 is a true and correct copy of SK00583387, a document produced by Songkick in this Action.
- 133. Attached hereto as Exhibit 128 is a true and correct copy of SK00614146, a document produced by Songkick in this Action.
- 134. Attached hereto as Exhibit 129 is a true and correct copy of SK00614149, a document produced by Songkick in this Action.
- 135. Attached hereto as Exhibit 130 is a true and correct copy of SK00614224, a document produced by Songkick in this Action.
- 136. Attached hereto as Exhibit 131 is a true and correct copy of SK00614359, a document produced by Songkick in this Action.

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- 137. Attached hereto as Exhibit 132 (intentionally left blank).
- 138. Attached hereto as Exhibit 133 is a true and correct copy of SK00614484, a document produced by Songkick in this Action.
- 139. Attached hereto as Exhibit 134 is a true and correct copy of SK00614825, a document produced by Songkick in this Action.
- 140. Attached hereto as Exhibit 135 is a true and correct copy of SK00615134, a document produced by Songkick in this Action.
- 141. Attached hereto as Exhibit 136 is a true and correct copy of SK00636717, a document produced by Songkick in this Action.
- 142. Attached hereto as Exhibit 137 is a true and correct copy of SK00664128, a document produced by Songkick in this Action.
- 143. Attached hereto as Exhibit 138 is a true and correct copy of SK00690690, a document produced by Songkick in this Action.
- 144. Attached hereto as Exhibit 139 is a true and correct copy of SK00699717, a document produced by Songkick in this Action.
- 145. Attached hereto as Exhibit 140 is a true and correct copy of SK00713393, a document produced by Songkick in this Action.
- 146. Attached hereto as Exhibit 141 is a true and correct copy of SK00731013, a document produced by Songkick in this Action.
- 147. Attached hereto as Exhibit 142 is a true and correct copy of SK00754765, a document produced by Songkick in this Action.
- 148. Attached hereto as Exhibit 143 is a true and correct copy of SK00812086, a document produced by Songkick in this Action.
- 149. Attached hereto as Exhibit 144 is a true and correct copy of SK00828104, a document produced by Songkick in this Action.
 - 150. Attached hereto as Exhibit 145 (intentionally left blank).
- 151. Attached hereto as Exhibit 146 is a true and correct copy of SK00831453, a document produced by Songkick in this Action.

- 152. Attached hereto as Exhibit 147 is a true and correct copy of SK00832545, a document produced by Songkick in this Action.
- 153. Attached hereto as Exhibit 148 is a true and correct copy of SK00832554, a document produced by Songkick in this Action.
 - 154. Attached hereto as Exhibit 149 (intentionally left blank).
 - 155. Attached hereto as Exhibit 150 (intentionally left blank).
- 156. Attached hereto as Exhibit 151 is a true and correct copy of SK00832911, a document produced by Songkick in this Action.
- 157. Attached hereto as Exhibit 152 is a true and correct copy of SK00851998, a document produced by Songkick in this Action.
- 158. Attached hereto as Exhibit 153 is a true and correct copy of SK00852330, a document produced by Songkick in this Action.
- 159. Attached hereto as Exhibit 154 is a true and correct copy of SK00868887, a document produced by Songkick in this Action.
- 160. Attached hereto as Exhibit 155 is a true and correct copy of SK00869874, a document produced by Songkick in this Action.
- 161. Attached hereto as Exhibit 156 is a true and correct copy of SK00870734, a document produced by Songkick in this Action.
- 162. Attached hereto as Exhibit 157 is a true and correct copy of SK00887782, a document produced by Songkick in this Action.
- 163. Attached hereto as Exhibit 158 is a true and correct copy of SK00903865, a document produced by Songkick in this Action.
- 164. Attached hereto as Exhibit 159 is a true and correct copy of SK00916262, a document produced by Songkick in this Action.
- 165. Attached hereto as Exhibit 160 is a true and correct copy of SK00920901, a document produced by Songkick in this Action.
- 166. Attached hereto as Exhibit 161 is a true and correct copy of SK00931666, a document produced by Songkick in this Action.

- 167. Attached hereto as Exhibit 162 is a true and correct copy of SK00932679, a document produced by Songkick in this Action.
 - 168. Attached hereto as Exhibit 163 (intentionally left blank).
- 169. Attached hereto as Exhibit 164 is a true and correct copy of SK00954885, a document produced by Songkick in this Action.
- 170. Attached hereto as Exhibit 165 is a true and correct copy of SK00959359, a document produced by Songkick in this Action.
- 171. Attached hereto as Exhibit 166 is a true and correct copy of SK00966738, a document produced by Songkick in this Action.
- 172. Attached hereto as Exhibit 167 is a true and correct copy of SK00966794, a document produced by Songkick in this Action.
- 173. Attached hereto as Exhibit 168 is a true and correct copy of SK00967543, a document produced by Songkick in this Action.
- 174. Attached hereto as Exhibit 169 is a true and correct copy of SK00978910, a document produced by Songkick in this Action.
- 175. Attached hereto as Exhibit 170 is a true and correct copy of SK00979858, a document produced by Songkick in this Action.
- 176. Attached hereto as Exhibit 171 is a true and correct copy of SK00998526, a document produced by Songkick in this Action.
- 177. Attached hereto as Exhibit 172 is a true and correct copy of SK00998621, a document produced by Songkick in this Action.
- 178. Attached hereto as Exhibit 173 is a true and correct copy of SK00998684, a document produced by Songkick in this Action.
 - 179. Attached hereto as Exhibit 174 (intentionally left blank).
- 180. Attached hereto as Exhibit 175 is a true and correct copy of SK00998708, a document produced by Songkick in this Action.
- 181. Attached hereto as Exhibit 176 is a true and correct copy of SK00998710, a document produced by Songkick in this Action.

- 182. Attached hereto as Exhibit 177 is a true and correct copy of SK00998732, a document produced by Songkick in this Action.
- 183. Attached hereto as Exhibit 178 is a true and correct copy of SK00998735, a document produced by Songkick in this Action.
- 184. Attached hereto as Exhibit 179 is a true and correct copy of SK00998761, a document produced by Songkick in this Action.
- 185. Attached hereto as Exhibit 180 is a true and correct copy of SK00998772, a document produced by Songkick in this Action.
- 186. Attached hereto as Exhibit 181 is a true and correct copy of SK00998796, a document produced by Songkick in this Action.
- 187. Attached hereto as Exhibit 182 is a true and correct copy of SK00998798, a document produced by Songkick in this Action.
- 188. Attached hereto as Exhibit 183 is a true and correct copy of SK00998802, a document produced by Songkick in this Action.
- 189. Attached hereto as Exhibit 184 is a true and correct copy of SK00998804, a document produced by Songkick in this Action.
- 190. Attached hereto as Exhibit 185 is a true and correct copy of SK00998810, a document produced by Songkick in this Action.
- 191. Attached hereto as Exhibit 186 is a true and correct copy of SK00998823, a document produced by Songkick in this Action.
- 192. Attached hereto as Exhibit 187 is a true and correct copy of SK00998928, a document produced by Songkick in this Action.
- 193. Attached hereto as Exhibit 188 is a true and correct copy of SK00998951, a document produced by Songkick in this Action.
- 194. Attached hereto as Exhibit 189 is a true and correct copy of SK00998965, a document produced by Songkick in this Action.
- 195. Attached hereto as Exhibit 190 is a true and correct copy of SK00998977, a document produced by Songkick in this Action.

- 196. Attached hereto as Exhibit 191 is a true and correct copy of SK00998981, a document produced by Songkick in this Action.
- 197. Attached hereto as Exhibit 192 is a true and correct copy of SK00998985, a document produced by Songkick in this Action.
- 198. Attached hereto as Exhibit 193 is a true and correct copy of SK00999666, a document produced by Songkick in this Action.
- 199. Attached hereto as Exhibit 194 is a true and correct copy of SK00999669, a document produced by Songkick in this Action.
- 200. Attached hereto as Exhibit 195 is a true and correct copy of SK00999737, a document produced by Songkick in this Action.
- 201. Attached hereto as Exhibit 196 is a true and correct copy of SK00999744, a document produced by Songkick in this Action.
- 202. Attached hereto as Exhibit 197 is a true and correct copy of SK00999758, a document produced by Songkick in this Action.
 - 203. Attached hereto as Exhibit 198 (intentionally left blank).
 - 204. Attached hereto as Exhibit 199 (intentionally left blank).
- 205. Attached hereto as Exhibit 200 is a true and correct copy of TM00000001, a document produced by Defendants in this Action.
- 206. Attached hereto as Exhibit 201 is a true and correct copy of TM00000151, a document produced by Defendants in this Action.
- 207. Attached hereto as Exhibit 202 is a true and correct copy of TM00000175, a document produced by Defendants in this Action.
- 208. Attached hereto as Exhibit 203 is a true and correct copy of TM00000243, a document produced by Defendants in this Action.
- 209. Attached hereto as Exhibit 204 is a true and correct copy of TM00000297, a document produced by Defendants in this Action.
- 210. Attached hereto as Exhibit 205 is a true and correct copy of TM00000362, a document produced by Defendants in this Action.

- 211. Attached hereto as Exhibit 206 is a true and correct copy of TM00000416, a document produced by Defendants in this Action.
- 212. Attached hereto as Exhibit 207 is a true and correct copy of TM00000460, a document produced by Defendants in this Action.
- 213. Attached hereto as Exhibit 208 is a true and correct copy of TM00000574, a document produced by Defendants in this Action.
- 214. Attached hereto as Exhibit 209 is a true and correct copy of TM00000617, a document produced by Defendants in this Action.
- 215. Attached hereto as Exhibit 210 is a true and correct copy of TM00000745, a document produced by Defendants in this Action.
- 216. Attached hereto as Exhibit 211 is a true and correct copy of TM00000907, a document produced by Defendants in this Action.
- 217. Attached hereto as Exhibit 212 is a true and correct copy of TM00000948, a document produced by Defendants in this Action.
- 218. Attached hereto as Exhibit 213 is a true and correct copy of TM00000977, a document produced by Defendants in this Action.
- 219. Attached hereto as Exhibit 214 is a true and correct copy of TM00001046, a document produced by Defendants in this Action.
- 220. Attached hereto as Exhibit 215 is a true and correct copy of TM00001230, a document produced by Defendants in this Action.
- 221. Attached hereto as Exhibit 216 is a true and correct copy of TM00001319, a document produced by Defendants in this Action.
- 222. Attached hereto as Exhibit 217 is a true and correct copy of TM00001433, a document produced by Defendants in this Action.
- 223. Attached hereto as Exhibit 218 is a true and correct copy of TM00001460, a document produced by Defendants in this Action.
- 224. Attached hereto as Exhibit 219 is a true and correct copy of TM00001761, a document produced by Defendants in this Action.

- 225. Attached hereto as Exhibit 220 is a true and correct copy of TM00001799, a document produced by Defendants in this Action.
- 226. Attached hereto as Exhibit 221 is a true and correct copy of TM00002007, a document produced by Defendants in this Action.
- 227. Attached hereto as Exhibit 222 is a true and correct copy of TM00002129, a document produced by Defendants in this Action.
- 228. Attached hereto as Exhibit 223 is a true and correct copy of TM00002280, a document produced by Defendants in this Action.
- 229. Attached hereto as Exhibit 224 is a true and correct copy of TM00002403, a document produced by Defendants in this Action.
- 230. Attached hereto as Exhibit 225 is a true and correct copy of TM00002505, a document produced by Defendants in this Action.
- 231. Attached hereto as Exhibit 226 is a true and correct copy of TM00002535, a document produced by Defendants in this Action.
- 232. Attached hereto as Exhibit 227 is a true and correct copy of TM00002607, a document produced by Defendants in this Action.
- 233. Attached hereto as Exhibit 228 is a true and correct copy of TM00002684, a document produced by Defendants in this Action.
- 234. Attached hereto as Exhibit 229 is a true and correct copy of TM00002765, a document produced by Defendants in this Action.
- 235. Attached hereto as Exhibit 230 is a true and correct copy of TM00002845, a document produced by Defendants in this Action.
- 236. Attached hereto as Exhibit 231 is a true and correct copy of TM00003023, a document produced by Defendants in this Action.
- 237. Attached hereto as Exhibit 232 is a true and correct copy of TM00003067, a document produced by Defendants in this Action.
- 238. Attached hereto as Exhibit 233 is a true and correct copy of TM00003100, a document produced by Defendants in this Action.

- 239. Attached hereto as Exhibit 234 is a true and correct copy of TM00003185, a document produced by Defendants in this Action.
- 240. Attached hereto as Exhibit 235 is a true and correct copy of TM00003333, a document produced by Defendants in this Action.
- 241. Attached hereto as Exhibit 236 is a true and correct copy of TM00003422, a document produced by Defendants in this Action.
- 242. Attached hereto as Exhibit 237 is a true and correct copy of TM00003455, a document produced by Defendants in this Action.
- 243. Attached hereto as Exhibit 238 is a true and correct copy of TM00003566, a document produced by Defendants in this Action.
- 244. Attached hereto as Exhibit 239 is a true and correct copy of TM00003743, a document produced by Defendants in this Action.
- 245. Attached hereto as Exhibit 240 is a true and correct copy of TM00003806, a document produced by Defendants in this Action.
- 246. Attached hereto as Exhibit 241 is a true and correct copy of TM00003847, a document produced by Defendants in this Action.
- 247. Attached hereto as Exhibit 242 is a true and correct copy of TM00003880, a document produced by Defendants in this Action.
- 248. Attached hereto as Exhibit 243 is a true and correct copy of TM00003894, a document produced by Defendants in this Action.
- 249. Attached hereto as Exhibit 244 is a true and correct copy of TM00007757, a document produced by Defendants in this Action.
- 250. Attached hereto as Exhibit 245 is a true and correct copy of TM00009032, a document produced by Defendants in this Action.
- 251. Attached hereto as Exhibit 246 is a true and correct copy of TM00011030, a document produced by Defendants in this Action.
- 252. Attached hereto as Exhibit 247 is a true and correct copy of TM00011465, a document produced by Defendants in this Action.

- 253. Attached hereto as Exhibit 248 is a true and correct copy of TM00011488, a document produced by Defendants in this Action.
- 254. Attached hereto as Exhibit 249 is a true and correct copy of TM00011542, a document produced by Defendants in this Action.
 - 255. Attached hereto as Exhibit 250 (intentionally left blank).
- 256. Attached hereto as Exhibit 251 is a true and correct copy of TM00011545, a document produced by Defendants in this Action.
- 257. Attached hereto as Exhibit 252 is a true and correct copy of TM00011697, a document produced by Defendants in this Action.
- 258. Attached hereto as Exhibit 253 is a true and correct copy of TM00012332, a document produced by Defendants in this Action.
 - 259. Attached hereto as Exhibit 254 (intentionally left blank).
- 260. Attached hereto as Exhibit 255 is a true and correct copy of TM00014926, a document produced by Defendants in this Action.
- 261. Attached hereto as Exhibit 256 is a true and correct copy of TM00015973, a document produced by Defendants in this Action.
- 262. Attached hereto as Exhibit 257 is a true and correct copy of TM00016320, a document produced by Defendants in this Action.
- 263. Attached hereto as Exhibit 258 is a true and correct copy of TM00030975, a document produced by Defendants in this Action.
- 264. Attached hereto as Exhibit 259 is a true and correct copy of TM00031420, a document produced by Defendants in this Action.
- 265. Attached hereto as Exhibit 260 is a true and correct copy of TM00032023, a document produced by Defendants in this Action.
- 266. Attached hereto as Exhibit 261 is a true and correct copy of TM00032304, a document produced by Defendants in this Action.
- 267. Attached hereto as Exhibit 262 is a true and correct copy of TM00033328, a document produced by Defendants in this Action.

- 278. Attached hereto as Exhibit 273 is a true and correct copy of TM00046233, a document produced by Defendants in this Action.
- 279. Attached hereto as Exhibit 274 is a true and correct copy of TM00049712, a document produced by Defendants in this Action.
 - 280. Attached hereto as Exhibit 275 (intentionally left blank).

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- 281. Attached hereto as Exhibit 276 is a true and correct copy of TM00050874, a document produced by Defendants in this Action.
 - 282. Attached hereto as Exhibit 277 is a true and correct copy of

283. Attached hereto as Exhibit 278 is a true and correct copy of

TM00051006, a document produced by Defendants in this Action.

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Case No. 15-cv-9814-DSF-AGRx

DECLARATION OF ADAM WOLFSON

297. Attached hereto as Exhibit 292 is a true and correct copy of

TM00056671, a document produced by Defendants in this Action.

TM00056711, a document produced by Defendants in this Action.

298. Attached hereto as Exhibit 293 (intentionally left blank).

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DECLARATION OF ADAM WOLFSON

- TM00062890, a document produced by Defendants in this Action.
- 312. Attached hereto as Exhibit 307 is a true and correct copy of TM00064105, a document produced by Defendants in this Action.
- 313. Attached hereto as Exhibit 308 is a true and correct copy of TM00064905, a document produced by Defendants in this Action.
- 314. Attached hereto as Exhibit 309 is a true and correct copy of TM00064943, a document produced by Defendants in this Action.
- 315. Attached hereto as Exhibit 310 is a true and correct copy of TM00065021, a document produced by Defendants in this Action.
- 316. Attached hereto as Exhibit 311 is a true and correct copy of TM00066256, a document produced by Defendants in this Action.
- 317. Attached hereto as Exhibit 312 is a true and correct copy of TM00066311, a document produced by Defendants in this Action.
- 318. Attached hereto as Exhibit 313 is a true and correct copy of TM00066746, a document produced by Defendants in this Action.
- 319. Attached hereto as Exhibit 314 is a true and correct copy of TM00066804, a document produced by Defendants in this Action.
- 320. Attached hereto as Exhibit 315 is a true and correct copy of TM00067642, a document produced by Defendants in this Action.
- 321. Attached hereto as Exhibit 316 is a true and correct copy of TM00067646, a document produced by Defendants in this Action.
- 322. Attached hereto as Exhibit 317 is a true and correct copy of TM00067647, a document produced by Defendants in this Action.
- 323. Attached hereto as Exhibit 318 is a true and correct copy of TM00067648, a document produced by Defendants in this Action.
- 324. Attached hereto as Exhibit 319 is a true and correct copy of TM00068803, a document produced by Defendants in this Action.
 - 325. Attached hereto as Exhibit 320 is a true and correct copy of

326. Attached hereto as Exhibit 321 is a true and correct copy of

TM00069003, a document produced by Defendants in this Action.

TM00069513, a document produced by Defendants in this Action.

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Case No. 15-cv-9814-DSF-AGRx

DECLARATION OF ADAM WOLFSON

340. Attached hereto as Exhibit 335 is a true and correct copy of

TM00083008, a document produced by Defendants in this Action.

TM00085770, a document produced by Defendants in this Action.

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Case No. 15-cv-9814-DSF-A

DECLARATION OF ADAM WOLFSON

355. Attached hereto as Exhibit 350 is a true and correct copy of

TM00104223, a document produced by Defendants in this Action.

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369. Attached hereto as Exhibit 364 is a true and correct copy of

TM00111423, a document produced by Defendants in this Action.

TM00111424, a document produced by Defendants in this Action.

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Case No. 15-cv-9814-DSF-AGRX
DECLARATION OF ADAM WOLFSON

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TM00119667, a document produced by Defendants in this Action.

- 383. Attached hereto as Exhibit 378 is a true and correct copy of TM00125474, a document produced by Defendants in this Action.
- 384. Attached hereto as Exhibit 379 is a true and correct copy of TM00125475, a document produced by Defendants in this Action.
- 385. Attached hereto as Exhibit 380 is a true and correct copy of TM00125490, a document produced by Defendants in this Action.
- 386. Attached hereto as Exhibit 381 is a true and correct copy of TM00125975, a document produced by Defendants in this Action.
- 387. Attached hereto as Exhibit 382 is a true and correct copy of TM00126032, a document produced by Defendants in this Action.
- 388. Attached hereto as Exhibit 383 is a true and correct copy of Deposition Exhibit 672 (a demonstrative exhibit showing Songkick's EBITDA).
 - 389. Attached hereto as Exhibit 384 (intentionally left blank).
- 390. Attached hereto as Exhibit 385 is a true and correct copy of Deposition Exhibit 123 (Ticketmaster User Agreement between Ticketmaster L.L.C. and the City of Rochester, Minnesota).
- 391. Attached hereto as Exhibit 386 is a true and correct copy of a May 2009 article by Aswath Damodaran titled, "Valuing Young, Start-up and Growth Companies: Estimation Issues and Valuation Challenges."
- 392. Attached hereto as Exhibit 387 is a true and correct copy of excerpts from the transcript of the deposition of Jessica Bellin, taken on Feb. 23, 2017.
- 393. Attached hereto as Exhibit 388 is a true and correct copy of excerpts from the transcript of the deposition of Joseph Farrell, taken on May 22, 2017.
- 394. Attached hereto as Exhibit 389 is a true and correct copy of excerpts from the transcript of the deposition of Cole Gahagan, taken on Jan. 10, 2017.
 - 395. Attached hereto as Exhibit 390 (intentionally left blank).
 - 396. Attached hereto as Exhibit 391 is a true and correct copy of excerpts

from the transcript of the deposition of Stephen Glicken, taken on Feb. 7, 2017.

- 397. Attached hereto as Exhibit 392 is a true and correct copy of excerpts from the transcript of the deposition of Matthew O. Jones, taken on Mar. 8, 2017.
- 398. Attached hereto as Exhibit 393 is a true and correct copy of excerpts from the transcript of the deposition of Jeff Kline, taken on May 9, 2017.
- 399. Attached hereto as Exhibit 394 is a true and correct copy of excerpts from the transcript of the deposition of Mike Luba, taken on Feb. 28, 2017.
- 400. Attached hereto as Exhibit 395 is a true and correct copy of excerpts from the transcript of the deposition of David Marcus, taken on Feb. 17, 2017.
- 401. Attached hereto as Exhibit 396 is a true and correct copy of excerpts from the transcript of the deposition of Javier Martinez, taken on Feb. 24, 2017.
- 402. Attached hereto as Exhibit 397 is a true and correct copy of excerpts from the transcript of the deposition of Stephen Mead, taken on Jan. 13, 2017.
- 403. Attached hereto as Exhibit 398 is a true and correct copy of excerpts from the transcript of the deposition of Paul K. Meyer, taken on May 12, 2017.
- 404. Attached hereto as Exhibit 399 is a true and correct copy of excerpts from the transcript of the deposition of Daniel Miller, taken on Mar. 2, 2017.
- 405. Attached hereto as Exhibit 400 is a true and correct copy of excerpts from the transcript of the deposition of Martyn Noble, taken on Mar. 1, 2017.
- 406. Attached hereto as Exhibit 401 is a true and correct copy of excerpts from the transcript of the deposition of Janusz A. Ordover, taken on May 3, 2017.
- 407. Attached hereto as Exhibit 402 is a true and correct copy of excerpts from the transcript of the deposition of Michael Rapino, taken on Jan. 19, 2017.
- 408. Attached hereto as Exhibit 403 is a true and correct copy of excerpts from the transcript of the deposition of Greg Schmale, taken on Jan. 20, 2017.
- 409. Attached hereto as Exhibit 404 is a true and correct copy of excerpts from the transcript of the deposition of David Yurkerwich, taken on May 17, 2017.
 - 410. Attached hereto as Exhibit 405 is a true and correct copy of excerpts

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- 411. Attached hereto as Exhibit 406 is a true and correct copy of ACCESS00015778, a document produced by third party Access Industries in this Action.
- 412. Attached hereto as Exhibit 407 is a true and correct copy of SK00454438, a document produced by Songkick in this Action.
- 413. Attached hereto as Exhibit 408 is a true and correct copy of SK00444354, a document produced by Songkick in this Action.
- 414. Attached hereto as Exhibit 409 is a true and correct copy of SK00508902, a document produced by Songkick in this Action.
- 415. Attached hereto as Exhibit 410 is a true and correct copy of SK00816060, a document produced by Songkick in this Action.
- 416. Attached hereto as Exhibit 411 is a true and correct copy of SK00998631, a document produced by Songkick in this Action.
- 417. Attached hereto as Exhibit 412 is a true and correct copy of SK00998883, a document produced by Songkick in this Action.
- 418. Attached hereto as Exhibit 413 is a true and correct copy of SK00998956, a document produced by Songkick in this Action.
- 419. Attached hereto as Exhibit 414 is a true and correct copy of TM00039924, a document produced by Defendants in this Action.
- 420. Attached hereto as Exhibit 415 is a true and correct copy of TM00053467, a document produced by Defendants in this Action.
- 421. Attached hereto as Exhibit 416 is a true and correct copy of TM00068764, a document produced by Defendants in this Action.
- 422. Attached hereto as Exhibit 417 is a true and correct copy of TM00106929, a document produced by Defendants in this Action.
- 423. Attached hereto as Exhibit 418 is a true and correct copy of TM00111756, a document produced by Defendants in this Action.

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1	424.	Attached hereto as Exhibit 419 (intentionally left blank).
2	425.	Attached hereto as Exhibit 420 (intentionally left blank).
3	426.	Attached hereto as Exhibit 421 (intentionally left blank).
4	427.	Attached hereto as Exhibit 422 (intentionally left blank).
5	428.	Attached hereto as Exhibit 423 (intentionally left blank).
6	429.	Attached hereto as Exhibit 424 (intentionally left blank).
7	430.	Attached hereto as Exhibit 425 is a true and correct copy of an October
8	20, 2014 ar	ticle titled, "Live Nation reshuffles Management Assets, Launches the
9	New Maver	ick."
10	431.	Attached hereto as Exhibit 426 is a true and correct copy of excerpts
11	from Live N	Vation's Form 10-K for the fiscal year ended December 31, 2016.
12	432.	Attached hereto as Exhibit 427 is a true and correct copy of
13	TM0005094	14, a document produced by Defendants in this Action.
14	433.	Attached hereto as Exhibit 428 is a true and correct copy of
15	TM0008130	05, a document produced by Defendants in this Action.
16	434.	Attached hereto as Exhibit 429 is a true and correct copy of
17	TM0005212	23, a document produced by Defendants in this Action.
18	435.	Attached hereto as Exhibit 430 is a true and correct copy of
19	SK0099895	1, a document produced by Songkick in this Action.
20	436.	Attached hereto as Exhibit 431 is a true and correct copy of SK00998802, a document
21	produced by S	Songkick in this Action.
22	437.	I declare under penalty of perjury under the laws of the United States that
23	the foregoin	g is correct.
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28		

Case 2:15-cv-09814-DSF-AGR Document 236 Filed 06/27/17 Page 34 of 34 Page ID #:39223 Executed June 26, 2017, at Los Angeles, California. By: /s/ Adam Wolfson Adam Wolfson Case No. 15-cv-9814-DSF-AGRx